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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to
Address Energy Utility Customer Bill
Debt Accumulated During the
COVID-19 Pandemic.

Rulemaking 21-02-014

ASSIGNED COMMISSIONER'S SCOPING MEMO AND RULING

This Scoping Memo and Ruling covers the issues, need for hearing, schedule, category, and other matters necessary to set forth the scope of this proceeding pursuant to Public Utilities Code Section 1701.1. and Article 7 of the Commission's Rules of Practice and Procedure (Rules).

1. Procedural Background

In Resolution M-4842, issued on April 16, 2020, the California Public Utilities Commission (Commission or CPUC) ordered emergency protections including the current disconnection moratorium for ratepayers adversely affected by the COVID-19 pandemic. In Resolution M-4849, issued on February 11, 2021 the emergency protections were extended until June 30, 2021. These protections stem from the current Emergency Disaster Rulemaking (R.) 18-03-011.

Also on February 11, 2021, the Commission adopted the *Order Instituting Rulemaking to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic* (OIR). Pursuant to the OIR, this proceeding will examine the need for arrearage relief as a consequence of the impacts of the COVID-19 pandemic. This proceeding will focus on the appropriate parameters, cost estimates, and potential funding sources of relief.

The OIR names CPUC-jurisdictional electric and gas investor-owned utilities, including Pacific Gas and Electric Company (PG&E), San Diego Gas & Electric Company (SDG&E), Southern California Edison Company (SCE), and Southern California Gas Company (SoCalGas), (Large Investor-Owned Utilities or IOUs), PacifiCorp, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Company, Inc. (Bear Valley), Southwest Gas Corporation (Southwest Gas), Alpine Natural Gas, Inc (Alpine), West Coast Gas Company, Inc. (West Coast Gas) (Small and Multi-Jurisdictional Utilities or SMJUs), as respondents to this proceeding and automatically grants them party status.

On March 3, 2021, the following respondents filed comments on the OIR: PG&E, SDG&E, SCE, SoCalGas, and Southwest Gas. PacifiCorp, CalPeco Electric, and Bear Valley filed comments jointly as the California Association of Small and Multi-jurisdictional Utilities (CASMU). The following stakeholders also filed comments on the OIR, thus becoming parties to the proceeding The Utility Reform Network (TURN), Utility Consumers Action Network (UCAN), California Community Choice Association (CalCCA), joint comments by Leadership Counsel for Justice and Accountability and The Greenlining Institute, Small Business Utility Advocates (SBUA), joint comments by the National Consumer Law Center (NCLC) and the Center for Accessible Technology (CforAT), and the Public Advocates Office at the CPUC (Cal Advocates).

On March 8, 2021, a prehearing conference (PHC) was held to discuss the issues of law and fact, determine the need for hearing, set the schedule for resolving the matter, and address other matters as necessary. During the course of the PHC, the assigned Administrative Law Judge (ALJ) granted the California Water Association's written motion for party status and the California Environmental Justice Alliance's (CEJA) oral motion for party status.

After considering the comments on the OIR and the discussion at the PHC, I have determined the issues and initial schedule to be set forth in this scoping memo.

2. Issues in Scope

The OIR posed two threshold questions concerning whether the Commission should develop any special relief mechanism(s) to address energy arrearages accumulated during the COVID-19 period:

1. Is it reasonable to rely only upon existing policies and customer assistance programs to assist customers with arrearages that have accumulated during the COVID-19 period once the disconnection moratorium ends? On what basis?
2. Is it reasonable to develop arrearage relief to assist customers with arrearages that have accumulated during the COVID-19 period once the disconnection moratorium ends? On what basis?

Parties generally agreed that the combination of a prolonged worldwide pandemic, to which the Commission responded with emergency protections including a disconnection moratorium, and prolonged statewide shelter-at-home mandates and shutdowns of significant economic sectors, merits the Commission's consideration of arrearage relief mechanisms. Citing a robust suite of existing customer assistance policies and programs, including those newly ordered by Decision (D.) 20-06-003, PG&E, SCE, SDG&E and SCE prefer to

first examine how well these mechanisms perform before layering on additional support. However, given the Commission's approval of the instant rulemaking, and given the high arrearage totals for PG&E, SCE, SDG&E and SCE residential customers coupled with disproportionately negative economic and health impacts for vulnerable customers and communities of color, this scoping ruling determines that it is reasonable and appropriate to address arrearage relief for customers and utilities now.

Existing customer assistance policies and programs are designed to address affordability issues unrelated to the COVID-19 pandemic. These existing customer assistance policies and programs did not contemplate and do not directly address the issue of putting customers back on track for timely payments after a fifteen-month disconnection moratorium. To the extent the utility transition planning process¹ directed by Resolution M-4849 is focused on making sure customers are not caught off guard by the resumption of credit and collections activity, there is room in the transition plans to incorporate additional, more significant relief designed specifically for the pandemic.

This scoping ruling sets forth the following questions/issues to be addressed:

1. What extent and scale of arrearage relief is reasonable for customers and utilities, if any?
 - a. What amount of uncollected revenue is reasonable to be considered for relief?
 - b. Identify revenue sources potentially applicable for arrearage relief.

¹ The utility transition planning is occurring in accordance with Resolution M-4849.

- c. How does the amount of uncollected revenue to be considered for relief relate to the sources of revenue ultimately identified as applicable for funding relief?
2. What mechanism(s) should be used to provide the necessary relief presented in Question 1?
3. To what extent will relief mechanism(s) advance Goals 1, 4, 5, or 7 of the Commission's Environmental and Social Justice Action Plan?

***Goal 1:** Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts;*

***Goal 4:** Increase climate resiliency in ESJ communities;*

***Goal 5:** Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs;*

***Goal 7:** Promote economic and workforce development opportunities In ESJ communities.*

4. How should we define the COVID-19 pandemic period for purposes of determining the appropriate arrearage relief period ordered in this proceeding?
 - a. When should arrearage relief begin?
 - b. Should arrearage relief sunset?
 - c. How should the arrearage relief be timed relative to the disconnection moratorium?
5. Which customer classes, and within customer classes which customer segments, are most in need of relief, in light of the existing programs and policies currently available to energy utility customers, and on what basis? Should different customer classes receive different amounts or types of relief? What data supports this?
 - a. How should customers be identified for arrearage relief?
 - b. Should arrearage relief be conditional upon customer payment behavior, either past or future?

- c. Is there a reason to target arrearage relief to customers making timely payments? If so, how might such customers be identified?
 - d. Consider and recommend how arrearage relief could be tailored to residential customers so vulnerable and burdened that they are unlikely to be able to meet the terms of the Arrearage Management Program (AMP).
6. Please identify models of funding structures that would be applicable to funding arrearage relief, and provide a basis for such applicability.
- a. If at all, how would existing funding mechanisms in place for energy utilities related to the COVID-19 period or other cost recovery mechanisms be applicable to arrearage relief?
 - b. Do the impacts to utilities differ when customer debt is booked as uncollectible after a customer has been disconnected for non-payment, and when a customer's debt is forgiven through participation in an AMP?
 - c. How do utilities avoid double booking customer debt in light of this combination of uncollectible balances and forgiveness programs?
 - d. How should utilities determine and track the costs of arrearage relief?
 - e. Are funding structures that anticipate private capital, including those structures being utilized in other states and referenced in Section 2.6 of the OIR, suitable for arrearage relief? If so, how might such structures be utilized and implemented by the Commission?

Third-Party Energy Service Providers

7. Should arrearage relief be applied to Core Transport Agent (CTA), Energy Service Provider, and Community Choice Aggregator (CCA) customers? If so, how?
- a. Should Resolution E-5114 determinations to include or exclude CTA, Direct Access, or Net Energy Metering customers in AMPs be followed in this proceeding?

- b. To the extent that customers are not at risk of disconnection for failure to pay their CCA charges, does this change the need for arrearage relief of CCA charges?
- c. To what extent does Public Utilities Code Section 779.2 require utilities to allocate partial payments first to disconnectable charges?

SMJUs

- 8. What are the concerns and considerations, if any, unique to the small and multi-jurisdictional utilities (SMJUs) and their customers? If necessary, identify variations or alternatives to the straw proposals that would be applicable to the SMJUs.

2.1. Interaction of COVID-19 Arrearage Relief with Existing Programs and Policies Governed by Other Commission Proceedings

As stated *supra*, the Commission ordered the current emergency protections, most significantly the disconnection moratorium, in Resolution M-4842 and extended the emergency protections in Resolution M-4849, which stem from the Emergency Disaster R.18-03-011. Resolution M-4849 extended the moratorium through June 30, 2021. Several parties argue in response to the OIR² that the disconnection moratorium should extend beyond June 30, 2021. In general, modifications to the policies, programs, or rules ordered in related proceedings, especially in framework proceedings or multi-phase proceedings, should be decided in those proceedings. However, this proceeding is the venue to address immediate needs and solutions for problems specific to the COVID-19 period. As such, the instant proceeding will rely on

² CEJA at EH Transcript [insert]. UCAN Comments on OIR at 2, 4.

experience and data developed in related proceedings though the activities in this proceeding are necessarily conducted on an expedited basis.

A number of parties filed comments on the OIR's additional threshold questions about integrating arrearage relief with existing programs and outreach (OIR Scoping Questions 4.d.-e.). The spectrum of proposed relief mechanisms are extrapolated from current policies, practices or programs. This proceeding must address integration of various programs in order to avoid customer confusion and conflicting directives.

These additional questions/issues are within scope in this proceeding:

9. How should parties address the end date of the disconnection moratorium? Through/in R.18-03-011?
10. How can arrearage relief integrate with the recently adopted orders in D.20-06-003? Are any adjustments needed?
11. Should arrearage relief be coordinated with the utility transition plans ordered by the Commission in Resolution M-4849, including customer outreach?
12. What lessons, if any, should the Commission leverage from other relevant Commission proceedings addressing disconnections and bill affordability, and why?

2.2. External Arrearage Relief Identified

I recognize the direct bill credits that utilities and CCA's provided to their customers in 2020:

- Clean Power Alliance \$1 million overall.³
- Lancaster Choice Energy up to \$50 per grocery-worker customer.⁴
- Peninsula Clean Energy to approximately 36,000 California Alternatives Rates for Energy/Family Energy Rate Assistance (CARE/FERA) customers (\$100 each) and over 2,200 small business customers (\$250 each), over \$4 million overall.⁵
- Silicon Valley Clean Energy to approximately 36,000 CARE/FERA customers (\$100 each) and over 2,200 small business customers (\$250 each), \$10 million overall.⁶
- Western Community Energy \$25 per income-qualified customer.
- Clean Power SF the equivalent of 1 month's average bill -\$50 to single-family, \$3,000 to multi-family, \$750 to non-profits on small commercial rates.⁷

I also recognize the increases in direct assistance in 2020 provided through utility shareholders, employees and customers.

- PG&E's Relief for Energy Assistance through Community Help (REACH) program served approximately 3,100 customers, providing income-eligible customers a credit of up to \$400, including an additional \$100 for customers self-identifying as impacted by COVID-19.⁸

³ CalCCA Comments on the OIR at 7.

⁴ CalCCA Comments on the OIR at 7.

⁵ CalCCA Comments on the OIR at 7.

⁶ CalCCA Comments on the OIR at 7.

⁷ CalCCA Comments on the OIR at 8.

⁸ PG&E Draft Transition Plan at 16-17.

- SCE's Energy Assistance Fund distributed over \$1.5 million⁹ to over 10,000 households¹⁰, an average of \$150 per household.
- SoCalGas' Gas Assistance Fund (funded by shareholders) increase grant amounts from \$100 to \$200 in response to the pandemic. 4,090 customers received \$514,503, an average of \$126 per household, between March 1, 2020 and February 16, 2021.¹¹
- SDG&E contributed \$1 million to Neighbor-to-Neighbor and nearly doubled the number of customers receiving assistance in 2020 over prior years.¹²
- Southwest Gas provided \$400,000 to 1,100 customers, an average of \$363 per customer.¹³

3. Out of Scope

This proceeding will identify appropriate special relief mechanism(s) for direct utility customers, as well as sub-metered customers. Although sub-metered customers in multifamily housing, mobile home parks and under Homeowners Associations are not direct utility customers, the Commission has devised a method for these sub-metered customers to receive CARE/FERA discounts through their landlords and we will not foreclose the possibility that the special relief may utilize a similar channel for delivery to sub-metered customers. While Resolution E-5114 explicitly makes master-metered customers are ineligible for AMP,¹⁴ the Resolution leaves eligibility of sub-metered

⁹ SCE draft Transition Plan in compliance with Resolution M-4849 at 13.

¹⁰ SCE Comments on the OIR at 17.

¹¹ SoCalGas Comments on the OIR at 3.

¹² SDG&E Comments on the OIR at 13.

¹³ Southwest Gas draft Transition Plan in compliance with Resolution M-4849 at 4.

¹⁴ Resolution E-5114, Order 10.

customers unaddressed. Other than this exception, customer eligibility for special relief mechanism(s) will require the customer to be a direct utility customer with a utility bill in their name.

Leadership Counsel/Greenlining requested the proceeding include consideration of vulnerable utility customers that incurred debt with a third-party to pay their bills.¹⁵ It is infeasible for this expedited proceeding to take on calculating debt beyond “debt owed only to the utilities themselves.”¹⁶ While third-party debt, such as credit card debt, is excluded from the scope, I note Scoping Question 5 allows for discussion of whether and how customer payment behavior should factor into eligibility for relief.

Relief for renters without the utility bill in their name are also out of scope. We recognize that renters may have access to utility bill assistance as part of the Emergency Rental Assistance allocated to states and in California, (SB 91).¹⁷

4. Workshop

The purpose of the workshop is for stakeholders to explore each other’s proposals for arrearage relief and identify areas of commonality and inherent conflicts in policy goals. The timing of the workshop is intended to help inform party responses to the questions to a forthcoming ALJ Ruling.

A workshop agenda and remote access information is provided in Attachment A. Workshop participants should rank their first and second choice work team preferences among those listed in Attachment B. There will be five workshop sessions across two days. The first session will kick off with experts

¹⁵ Leadership Counsel/Greenling Comments on the OIR at 7, 9, 11.

¹⁶ Leadership Counsel/Greenling Comments on the OIR at 11.

¹⁷ See the California Business, Consumer Services, and Housing Agency’s informational website on the COVID-19 Tenant Relief Act, including program details, here: <https://www.bcsb.ca.gov/covidrelief/>.

describing relevant initiatives, tradeoffs made, and lessons learned. Session 2 will provide a status on federal relief available for utility bill debt. In Session 3, assigned work teams of five or six stakeholder representatives will self-organize to discuss one of five proposal areas. Work teams will prepare to share the results of their discussion in a presentation the following morning. Session 4 will be recorded to memorialize the presentations and subsequent questions and answers among work teams, kickoff session panelists and other stakeholders. The workshop will conclude with a Status Conference, in a roundtable format giving all stakeholders the opportunity to present their independent conclusions and positions.

5. Need for Evidentiary Hearing

Determinations on scoped issues 1 - 8 may rest on material facts that are potentially subject to dispute. However, we anticipate that the parties' participation in workshops may lead to stipulations regarding those facts. In anticipation of such stipulations, we affirm the Commission's unopposed initial determination that evidentiary hearing is not needed.

6. Schedule

The following schedule is adopted here, and the assigned Commissioner or the assigned ALJ may modify this schedule to promote efficient and fair resolution of this proceeding.

SCHEDULE

Event	Date
Scoping Memo and Ruling including Workshop Agenda, Remote Access Information and Work Team Proposal Areas, issued	March 15, 2021
Ruling Seeking Comment on Workshop Questions, issued	March 18, 2021
RSVP and Work Team Requests sent by Parties to Benjamin.menzies@cpuc.ca.gov	March 18, 2021
Supporting Data and Documentation Associated with Party Proposals Cited in Attachment B sent by Parties to Benjamin.menzies@cpuc.ca.gov	March 19, 2021
Comments on Scoping Memo, filed and served	March 22, 2021
Final Workshop Agenda and Work Team Assignments Posted to https://www.cpsc.ca.gov/General.aspx?id=6442468180	March 23, 2021
Workshop, held	March 25 - 26, 2021
Status Conference, held	March 26, 2021 1:30 p.m. – 3 p.m.
Responses to Workshop Questions, filed and served	April 5, 2021
Opening Briefs, filed and served	April 15, 2021
Reply Briefs, filed and served	April 22, 2021
Proposed decision, issued	May 21, 2021
Commission decision, issued	June 24, 2021

6.1. Data Availability and Access to Documents in Related Proceedings

Resolving this proceeding in mere months requires easy access to available data, and quick production of additional data. We have gathered the relevant raw data already publicly available to one central Commission webpage supporting this <https://www.cpsc.ca.gov/General.aspx?id=6442468180>. Certain new data is required and will be uploaded as it becomes available.

Data File	Customer class & segment	Proceeding	Available OR Anticipated Date of Upload
Annual and Monthly CARE/FERA Reports (IOU)	Residential	A.19-11-003 et al	Available
Annual CARE/FERA Reports (SMJU)	Residential	A.20-03-014 et al	Available (2019)
Monthly Disconnection Reports (IOU)	Residential	R.18-07-005	Available (2018-current)
Environmental and Social Justice Communities, including Disadvantaged Communities	N/A	Key proceedings furthering ESJ priorities: R.18-07-006/ R.18-04-019/R.18-10-007	Partially available
Transition Plans (IOU and SMJU)	Residential and Small Business	Advice Letter filings pursuant to Resolution M-4849	Available
Supporting Data and Documentation Associated with Party Proposals Cited in Attachment B		R.21-02-014	Expected to be available 3/22/21

7. Category of Proceeding and *Ex Parte* Restrictions

This ruling confirms the Commission's preliminary determination that this proceeding is categorized as ratesetting. Accordingly, *ex parte* communications are restricted and will be required to be reported pursuant to Article 8 of the Commission's Rules of Practice and Procedure.

8. Filing and Service of Comments and Other Documents

Filing and service of comments and other documents in the proceeding are governed by the Commission's Rules of Practice and Procedure.

9. Addition to Official Service List

Addition to the official service list is governed by Rule 1.9(f) of the Commission's Rules of Practice and Procedure.

Respondents are parties to the proceeding (see Rule 1.4(d)) and have been placed on the official service list.

Any person will be added to the "Information Only" category of the official service list upon request, for electronic service of all documents in the proceeding, and should do so promptly in order to ensure timely service of comments and other documents and correspondence in the proceeding. (See Rule 1.9(f).) The request must be sent to the Process Office by e-mail (process_office@cpuc.ca.gov) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, California 94102). Please include the Docket Number of this rulemaking in the request.

10. Intervenor Compensation

Intervenor Compensation is permitted in this proceeding.

Pursuant to Pub. Util. Code § 1804(a)(1), a customer who intends to seek an award of compensation must file and serve a notice of intent to claim compensation by April 7, 2021, 30 days after the PHC. Parties new to participating in Commission proceedings may contact the Commission's Public Advisor.

11. Public Advisor

Any person interested in participating in this proceeding who is unfamiliar with the Commission's procedures or has questions about the electronic filing procedures is encouraged to obtain more information at <http://consumers.cpus.ca.gov/pao/> or contact the Commission's Public

Advisor at 1-866-849-8390 or 1-866-836-7825 (TTY), or send an e-mail to public.advisor@cpuc.ca.gov.

12. Public Outreach

Pursuant to Public Utilities Code Section 1711(a), I hereby report that the Commission sought the participation of those likely to be affected by this matter in the following ways. The Commission served the OIR on the following service lists: R.18-07-005, R.18-03-011, R.14-11-007 et. al, Application (A.) 19-11-003 et. al, R.15-03-010, R.18-07-006, R.12-06-013, R.17-06-024. The Commission's Energy Division staff emailed the OIR to all in attendance at the Commission's November 12, 2020 Workshop on COVID-19 impacts in the energy sector. Energy Division staff referenced the OIR at the Low-Income Oversight Board public subcommittee meeting on March 3, 2021 and I announced the proceeding at the Low-Income Oversight Board meeting on March 10, 2021.

13. Assignment of Proceeding

Martha Guzman-Aceves is the assigned Commissioner and Camille Watts-Zagha is the assigned Administrative Law Judge and presiding officer for the proceeding.

O R D E R

IT IS ORDERED that:

1. The scope of this proceeding is described above.
2. The schedule of this proceeding is set forth above.
3. Evidentiary hearing is not needed.
4. The category of the proceeding is ratesetting.
5. The presiding officer is Administrative Law Judge Camille Watts-Zagha.
6. Parties should, and stakeholders may, designate one more representative to actively participate in the workshop described in Attachments A and B.

7. Parties and stakeholders should notify Benjamin Menzies of their workshop representative(s) names, contact information and each representative's first and second choice of work team by no later than Thursday, March 18, 2021.

8. Any party with a proposal listed in Attachment B should provide to Benjamin Menzies supporting data (in Excel) and documentation associated with said proposal by no later than Friday, March 19, 2021.

This order is effective today.

Dated March 15, 2021, at San Francisco, California.

/s/ MARTHA GUZMAN ACEVES

Martha Guzman Aceves
Assigned Commissioner

ATTACHMENT A

Workshop Agenda and Access Information

OBJECTIVE: Build on proposals submitted, by making explicit the criteria and priorities underpinning each proposal and consideration of modifications by diverse stakeholder groups.

March 25, 2021 Sessions 1 - 3

Video and Audio Access: <https://cpuc.webex.com>

Audio Only Access (Toll Free Number): (855) 282-6330

Meeting Number: 187 109 5981

Session 1 9:30-10:30 am:

Understanding Criteria and Tradeoffs(Energy Division + Panel of Experts/Program Implementers Familiar With Similar Initiatives)

Guiding Questions:

- Which criteria [see below] are prominent in your initiative?
- Which tradeoffs were made?
- What uncertainties did you accept when launching your initiative? Was the initiative able to adapt to as necessary?

Session 2 10:30-11 am:

Q&A on Federal Relief for Utility Bill Assistance in CA (CA Department of Community Services and Development and/or LIHEAP Providers)

Session 3 1-2:30 pm:

Meeting in Work Teams for development of proposal areas (self-sponsored by stakeholders)

1. Introduce yourselves and describe your interest in this proposal.
2. Volunteers for facilitation, notetaking, presenter, other necessary roles?
3. Perform criteria exercise below

4. Discuss and decide upon modifications to proposal if necessary

Exercise Connecting Criteria to Proposal:

1. Identify/Choose criteria in grid. General Criteria might be such as [Simplicity, Feasibility, Fairness, Behavioral Incentives, Efficacy, Adequacy, Equity etc.]

2. Place √, or numbers, in boxes representing prioritization of criteria

General Criteria→						
More Specific Criteria→						
[insert proposal description here]						
[insert proposal description here]						

Break

3-4:30 pm

Continuation of Meeting in Work Teams for development of proposal areas (self-sponsored by stakeholders)

Prepare presentation, that includes answers to these questions:

- Which criteria does our proposal prioritize?
- Which tradeoffs are we making?

- What are the potential benefits and risks?
- What other options have we considered and dismissed, and why?

March 26, 2021 Session 4 - 5

Video and Audio Access: <https://cpuc.webex.com>

Audio Only Access (Toll Free Number): (855) 282-6330

Meeting Number: 187 802 5435

Session 4: 10-11:30 am:

Work Team Representatives Present Proposals and Take Questions from Invited Panelists (Recorded)

Presentation Should Include Your Work Team's Unique Version of Criteria Grid

Session 5: 1:30-3 pm:

Feedback from All Stakeholders (Similar to PHC, Conducted by ALJ/Commissioner, Two Rounds of Each Party Providing Feedback)
(Transcribed)

(END ATTACHMENT A)

ATTACHMENT B

Proposal Areas for Development by Work Teams

Work Team Proposal Area	Specific Proposals
#1 One-Time \$ Assistance	<ul style="list-style-type: none"> Require customers to make two consecutive on-time payments to receive credit, during which period the customer would not be eligible for disconnection (SoCalGas/SDG&E) Add to the eligibility criteria mandatory ESA participation and/or paperless billing (PG&E at 14) Add to the eligibility criteria a disconnection notice and no access to the debt forgiveness offered through LIHEAP or REACH (PG&E at 10-11) Provide “tiered” assistance to provide customers with assistance that is proportional to the size of their arrearage (NCLC/CforAT) Provide more than a \$200 credit to customers with arrears (Greenlining/Leadership Counsel) Provide a \$300 or \$400 credit to individuals with \$1000+ in arrears. (UCAN) Forgive “all or a significant portion of” residential arrearages during the moratorium, amortized over multiple years in rates (CalPA) Automatically forgive all arrears accumulated during the moratorium currently owed by CARE/FERA customers (TURN)
#2 Ongoing \$ assistance	<ul style="list-style-type: none"> Customers removed from AMP should still be eligible for this plan or something like it (NCLC/CforAT) Provide customers opportunity to “defer” payments for up to three months, as proposed for traditional payment plans (CalPA) Lower minimum AMP arrearage to \$300 temporarily for COVID-related arrears (SCE) AMP for nonCARE/nonFERA customers, forgive % of bill rather than fixed \$ amount to provide customers (CalCCA at 4) Consider incentives for completing a payment plan with consistent, timely payments, such as a credit off the first bill due after a customer's completed payment plan (CalPA and CalCCA at 6) Tie payment plan amount to a “household share” for which customer is responsible for repayment (e.g. 40%), with remainder to be financed through public purpose program charges or other assistance (UCAN)
#3 Ongoing, no new \$ assistance	<ul style="list-style-type: none"> Require IOUs to offer non-CARE/FERA res and small business customers with arrears during the moratorium 24 month payment plans (TURN)

	<ul style="list-style-type: none"> • Allow customers to enter into payment plans equal to twice the length of the moratorium (once lifted) (UCAN) • Allow customers 30-36 months for repayment (UCAN at 4) • Min 12 month and max 24 month terms for payment plans, with anything in-between equal to twice the number of months behind the customer (SCE at 8) • Length of payment plan should be based on number of months customer is behind (SoCalGas) • flexibility on several aspects might help 1)for customers with new accounts to enroll in payment plans even if they have only been customers for a short period 2)allow due date adjustments align with customers' paydays and budget planning (CalCCA at 6) • Auto-enrollment into 8 mo payment plan for all customers 61+ days and \$20+ overdue (SWGas at 4)
#4 Leveraging and/or Matching Existing Activities	<ul style="list-style-type: none"> • Loading order of bill relief (PG&E at 14) • Clarifying application of LIHEAP pledges to AMP program enrollees' monthly bill payments (CPUC) • Consider the interaction of any proposed programs with the debt forgiveness or incentives some Community Choice Aggregators (CCAs) have already provided to their customers (CalCCA at 2) • Coordinate across external programs, such as shareholder-funded assistance programs, LIHEAP, and city/county COVID-19 relief funding, to maximize impact and improve outreach to customers without creating new programs (multiple parties) • Automatically enroll customers in arrears in CARE or FERA (UCAN) • Exempt low-income customers from TOU rates in Summer and/or Fall 2021 (UCAN)
#5 Small business	<ul style="list-style-type: none"> • Consider more aggressive counseling (akin to federal regulation prior to foreclosure in 2008-2009) to assist small business customers in reducing their bills through on incentives via time-of-use adjustments, generation investments/incentives (SBUA at 3) • Min 12 month and max 24 month terms for payment plans, with anything in-between equal to twice the number of months behind the customer (SCE at 8) • Create temporary COVID-specific Economic Development Rate (or modify existing) for at-risk small business customers ineligible for the existing EDR, such as retail customers. (PG&E) • Consider targeting small businesses located in ESJ communities for assistance (SBUA at 3-4). • AMP for small business, forgive % of bill rather than fixed \$ amount to provide customers (CalCCA at 4)

(END ATTACHMENT B)